

REMARKS

Claims 1-28 were pending as of the office action mailed on January 9, 2008. Claims 1, 11, and 20 are in independent form.

Claims 1, 4, 8, 11, 13, 20, and 22 are being amended. No new matter has been added. Support for the amendments can be found in the specification, for example, on page 3, lines 4-5 and line 19, on page 12, lines 18-23, on page 13, lines 19-23, and in FIG. 1, reference symbol 112.

Reconsideration of the action is respectfully requested in light of the foregoing amendments and the following remarks.

Section 101 Rejections

Claims 11-19 were rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. In particular, the examiner stated that claims 11-19 are directed to a system comprising just software.

While the applicant does not concede to the office's rejection, in order to expedite prosecution, independent claim 11 has been amended to overcome the rejection under Section 101. The applicant respectfully requests that the rejection of claim 11 and claims 12-19, which depend from claim 11, be withdrawn.

Section 103 Rejections

Claims 1-5, 8-14, 17-23, and 26-28 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2002/0069223 ("Goodisman"), in view of U.S. Patent No. 6,295,542 ("Corbin").

Independent claim 1 has been amended to recite "identifying a target document relating to the text reference, where the identifying includes performing a search based on the text reference using a search engine". Neither Goodisman nor Corbin disclose or suggest this feature.

In rejecting claims 1-5, 8-14, 17-23, and 26-28, the examiner stated, in part, that “identifying a target document relating to the text reference” is disclosed by Goodisman at paragraphs [0039], [0052], [0053], and [0059].

In general, Goodisman proposes a method to create dynamic associations between objects, whereas objects can be associated to, e.g., applications, images, icons, pictures or other textual or non-textual objects. Activation of such an association can cause data to be communicated to a target, which can be, e.g., a browser on an initiating device.

Specifically, Goodisman defines the term “target” as follows:

“Targets can be understood to be a destination for data that can be retrieved or otherwise provided via a link selection or activation. Targets can be, for example, an object (e.g., document or portion thereof) as defined herein, or **targets can include devices, applications, scripts**, etc. In one example where a target is an object, a portion of a document can include a link, and when the link is activated, the object (e.g., text) can be replaced with other text, appended to, and/or a footnote created in the document. In an embodiment, **a target can be a pop-up window** that provides data or information regarding one or more of the linked objects (e.g., personal contact information, status of a telephone connection caused by the link activation, etc.). Targets can also include a telephone connection, a new browser window, a presentation of text that can be incorporated as an aside within a document, another document or window, or the present document or window (e.g., replace contents of present web page with linked web page, etc.). Those with ordinary skill in the art will recognize that there are various forms of targets, and the methods and systems herein are not limited to the type or format of targets.” (page 4, par. [0039]; emphasis added).

The applicant respectfully submits that “identifying a target document relating to the text reference [...]” as recited in claims 1, 11, and 20 is not disclosed or suggested by Goodisman. In particular, “devices, applications, scripts, [...] a pop-up window” identified in paragraph [0039] are not the same as a text reference. Furthermore, the “targets” identified by Goodisman are required to be “a destination for data” (see, e.g., paragraphs [0028], [0039]). In contrast, in claims 1, 11, and 20, a target document is identified and a hyperlink is generated to the target document. However, the target document is not used as a destination for data as in Goodisman.

Additionally, claim 1 recites “identifying a target document relating to the text reference, where the identifying includes performing a search based on the text reference using a search

engine.” Goodisman does not disclose or suggest identifying a target document relating to the text reference, where the identifying includes performing a search based on the text reference using a search engine. Additionally, Corbin discloses parsing a document twice, first, locating label strings identifying paragraphs and second, identifying cross-references, term definitions, and external references. Corbin does not disclose or suggest identifying a target document relating to the text reference, where the identifying includes performing a search based on the text reference using a search engine. The cited prior art, or any combination thereof, is not understood to disclose a search by a search engine, and, in particular, the cited prior art is not understood to disclose a search for a target document relating to a text reference by a search engine.

For the foregoing reasons, the applicant respectfully submits that independent claim 1 is in condition for allowance. Independent claims 11 and 20 include limitations corresponding to those of independent claim 1. It is therefore submitted, that claims 11 and 20 are in condition for allowance for at least the same reasons as set forth above.

Additionally, claims 2-10, 12-19, and 21-30, which depend from claims 1, 11, and 20, are in condition for allowance for at least the same reasons.

Conclusion

For the foregoing reasons, the applicant respectfully submits that all the claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant's selecting some particular arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist. Finally, the applicant's decision to amend or cancel any claim should not be understood as implying that the applicant agrees with any positions taken by the examiner with respect to that claim or other claims.

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Page : 12 of 12

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The applicant requests a two month extension of time. The excess claim and extension of time fees are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization.

Respectfully submitted,

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